



## Filing Receipt

**Received - 2022-03-17 09:12:16 AM**  
**Control Number - 52667**  
**ItemNumber - 61**

**1. Progress reports for each non-compliant distribution line identified within HOTECH's January 6, 2022 report;**

Heart of Texas Electric is committed to public safety and the safe and reliable operation of its distribution system. Because of its commitment HOTECH self-identified 43 distribution lines or line segments that cross USACE property at Lake Waco and Belton Lake. Of the 43 lines that HOTECH originally identified, 23 are in the Belton Lake area with the remaining 20 in the Lake Waco area. All sections were evaluated for proper clearance. In the Lake Waco area all lines were found to have proper clearance or had been permanently taken out of service. In the Belton Lake area HOTECH found seven sections in areas that could be deemed suitable for a sailboat by USACE that did not comply with the applicable clearance standards in Rule 232 of NESC Standard ANSI (c)(2) ("NESC Rule 232") September 2019.

HOTECH intends to bring its lines in compliance with all applicable requirements, but is not intending by its Attestation to indicate that lines listed with height requirement violation issues are in all instances out of compliance with the National Electrical Safety Code Standard ANSCI(c)(2), as adopted by the American National Safety Institute in effect at the time of construction.

HOTECH has worked with the Belton Lake manager and received authorization in a letter dated January 11 2022 to proceed with construction

HOTECH will complete engineering and design for each line, obtain a survey by a licensed surveyor reflecting the meets and bounds of the lines and water elevation detail, and submit a permit package to USACE as work progresses. HOTECH will continue to file monthly progress reports in this docket until all identified lines are determined to be compliant with USACE's requirements, whether due to additional review by USACE or reconstruction.

Attached is a progress report.

Owl Creek Line was evaluated in June of 2021 and permanently deenergized in June of 2021

Leona Park Line evaluation was completed in June of 2021, this line was removed in November of 2021.

Iron Bridge Park Line was evaluated in June of 2021 and found to be deenergized. This line was permanently deenergized in June of 2021

Winkler Park Line evaluation was completed in July of 2021, engineering and staking began in August 2021. Construction was completed 2-28-22

This required 2 miles of distribution line to be constructed on private property and approximately 1.5 miles of distribution line to be retired from the USACE property along with new right of way agreements from private land owners and right of entry from USACE.

HOTECH took this approach to insure safe and reliable electric service to the residential members in the area. All HOTECH line sections that are in question now serve only USACE parks.

White Flint Park evaluation was completed in July of 2021 and will require installing 65–75-foot poles to allow for proper clearance. Engineering and staking began August 2021. Contract crews are currently in the process of changing these poles with an estimated completion date of 3-18-2022 or before.

Cedar Ridge Park evaluation was completed in July 2021 and will require installation of a section of line out of the flood zone in order to retire the section in question and installing poles and anchors and a section of underground line to eliminate clearance issues. Engineering and staking started August 2021. USACE completion date of September 30 2022 in regards to their letter pertaining to security lighting. However, HOTECH estimates their work complete by April 29 2022 and will convert lines to secondary voltage to supply power for security lighting until USACE procures their lighting.

Buckhorn Cemetery Line was evaluated in June of 2021 and the section not meeting NESC/USACE requirements was removed in July of 2021.

**2. A designation of non-compliant lines as distribution or transmission lines;**

All HOTECH lines are distribution lines.

**3. Permitting, if any, obtained for jobs identified within its attestation;**

HOTECH acquired right of way agreements from private land owners in order to move lines and HOTECH has requested right of entry from the USACE to complete this work. Attached is a letter from the USACE Lake Belton.

**4. Mapping that identifies the location of each non-compliant line identified in the attestation;**

Attached

**5. Job specifications for work required to bring non-compliant lines into compliance, including but not limited to: a. Estimated or actual start date;**

HOTECH originally contacted the USACE in December 2020 to begin the process of evaluating the lines over Belton Lake. During 2021 we discussed with USACE, on multiple occasions their desire for everything to be located underground and were informed that the USACE was in the process of engineering the proposed route and acquiring funding to do so. We received a letter dated January 11 2022 from the USACE to proceed with installing poles to raise or reroute lines that did not meet clearance. HOTECH immediately began the process of raising or relocating lines that had not already been deenergized or removed. HOTECH had already identified line sections and anticipated the need to install taller poles or relocate lines.

**b. Estimated or actual completion date;**

Heart of Texas estimates it will complete all work identified by April-2022

Attached is the breakdown for each section labeled Belton Lake Clearance.

**c. Current status of the job;**

Owl Creek; Complete.

Leona Park; Complete.

Iron Bridge Park; Complete.

Winkler Park; Complete.

White Flint; in progress poles are being changed to allow for clearance.

Cedar Ridge Park; in progress line sections have been rerouted and poles installed for clearance. Awaiting contractor to install underground primary.

Buckhorn Cemetery Road; Complete.

6. **Measures taken by HOTECH to make the public aware of the non-compliant lines while the lines are in the process of being brought into compliance.**

As stated in paragraph two of the letter from Belton Lake Office, HOTECH will work with the USACE in a flood situation to deenergize lines. Currently HOTECH has no lines that cross over water. The only time this issue arises is during a flood event. HOTECH explored installing markers on lines but due to lead times for delivery of the markers believes all work would be complete before they would be delivered.

HOTECH notes that regardless of proper clearance when complete, all lines on USACE affected by a flood event will be deenergized until such time as lake levels are below the flood stage and deemed safe to reenergize.

HOTECH policy moving forward will be that all new lines constructed within a flowage easement of a lake or stream it will be constructed as underground installations.

### Belton Lake Clearance

| Name of Line Section   | Circuit Number     | Date Verified        | Clearance issues                     | Corrective action taken  | Date complete | Status      | Notes   | Est Completion  |
|------------------------|--------------------|----------------------|--------------------------------------|--|---------------|-------------|---|---|
| Owl Creek              | Leon Junction 2401 | Verified June 2021   | Insufficient clearance per NESC 2019 | Permanently deenergized  | 6/21/2021     | Complete    | Line only supplied one security light. Line constructed possibly in 1950's or before  | Complete  |
| Leona Park             | Moffat 1202        | Verified June 2021   | Insufficient clearance per NESC 2019 | Permanently deenergized  | 11/1/2021     | Complete    | Line only supplied one security light. Line constructed in 1950 or before.  | Complete  |
| Iron Bridge Park       | Leon Junction 2401 | Verified June 2021   | Insufficient clearance per NESC 2019 | Permanently deenergized  | 6/21/2021     | Complete    | Line had been deenergized for over a year. Line was not in use.   | Complete  |
| Winkler Park           | Leon Junction 2401 | Verified July 2021   | Insufficient clearance per NESC 2019 | This line was rerouted to private property. HOTEK acquired new right of way easements. Constructed two miles of distribution line on private property out of flood zone. Removed 1.5 miles of distribution line from USACOE property that was in flood zone. | 2/22/2022     | Complete    | This line fed Winkler Park and residential meters. Rerouted to serve only Winkler Park and gain necessary clearance.  | Complete  |
| White Flint Park       | Leon Junction 2401 | Verified July 2021   | Insufficient clearance per NESC 2019 | Requires installation of 65 and 75 foot poles to gain proper clearance.  | 3/22/2022     | In progress | Worked with USACOE to change poles. Originally USACOE requested lines to be installed underground. Later decided to leave overhead. Letter dated January 11 2022                                  | HOTEK estimates all work to be complete March 2022                |
| Cedar Ridge Park       | Moffat 1204        | Verified August 2021 | Insufficient clearance per NESC 2019 | Reroute a section of line to be able to remove a section in conflict. Install pole and anchor to move line off center of roadway. Convert line to secondary voltage to serve parking lot lights.   | 3/22/2022     | In Progress | Worked with USACE to change poles and install new ones where needed. Originally USACOE requested lines to be installed underground. Later decided to leave overhead. Letter dated January 11 2022 | HOTEK estimates all work in Cedar Ridge to be complete April 2021 |
| Buckhorn Cemetery Road | Moffat 1202        | Verified June 2021   | Insufficient clearance per NESC 2019 | Removed a section of line that was in conflict.  | 7/21/2021     | Complete    | One span crossed a road that could be flooded.  | Complete  |



Owl Creek Park Public Boat Ramp

Owl Creek Park

Owl Creek Park Rd



Leona Park

Leona Park Rd

36

Leona Park

Leona Park Ln



White Hall Cemetery

36

36



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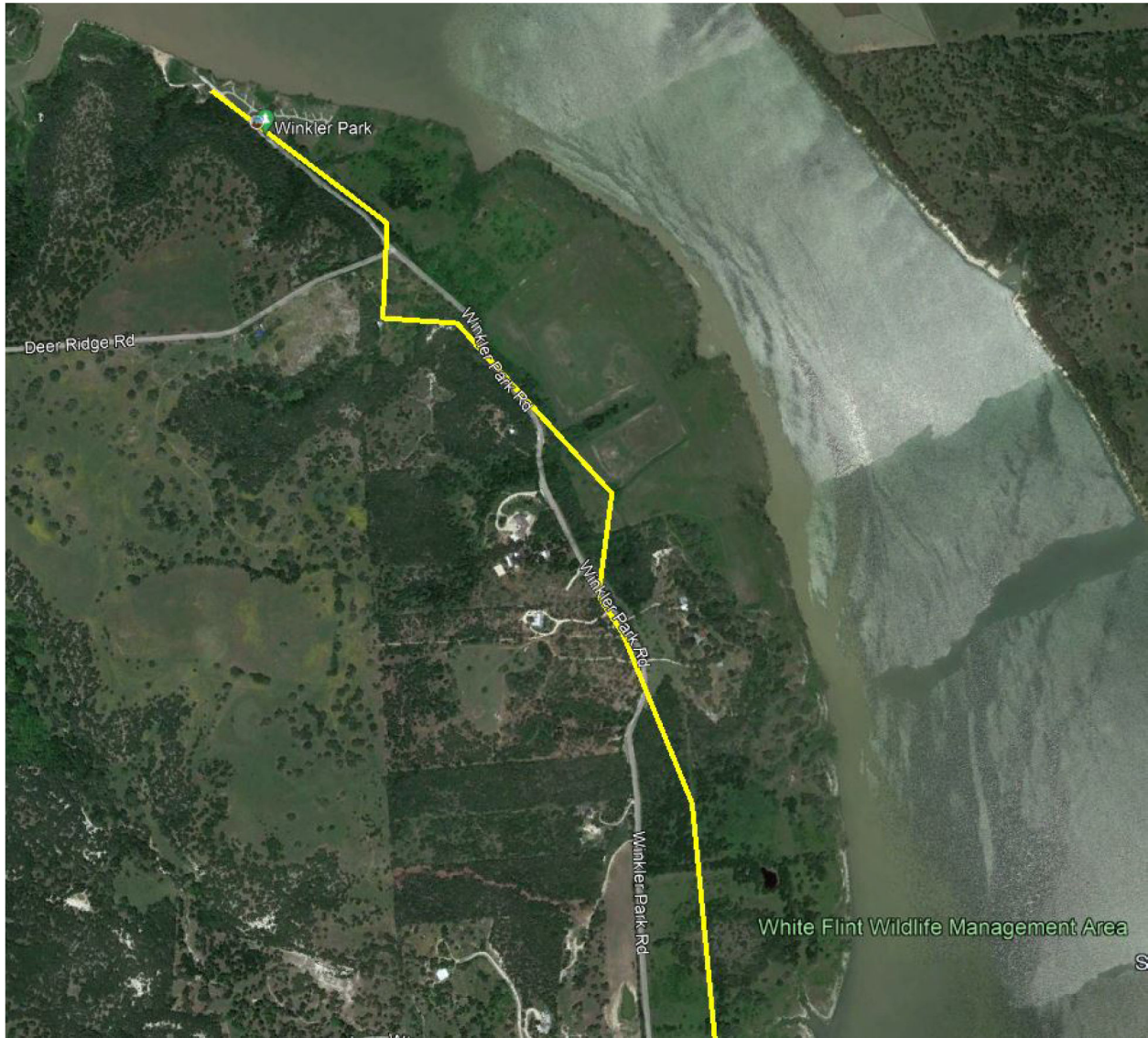




Iron Bridge Park Rd

Iron Bridge Park





Winkler Park

Deer Ridge Rd

Winkler Park Rd

Winkler Park Rd

Winkler Park Rd

White Flint Wildlife Management Area

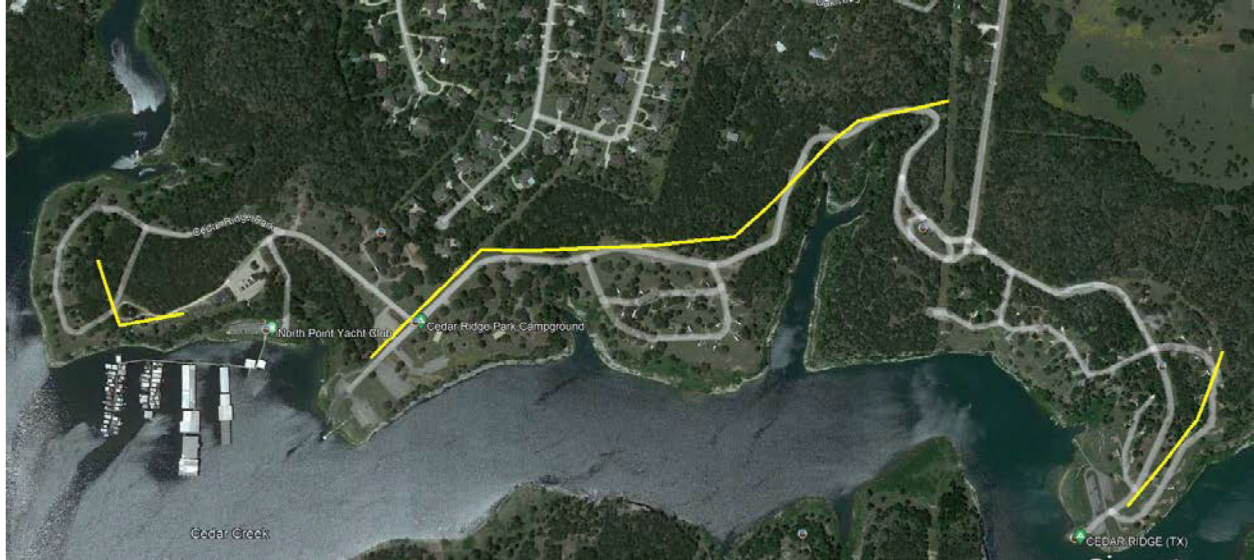


White Flint Park Rd

White Flint Cir

White Flint Park Rd

White Flint Park







Buckhorn Cemetery Rd

Brewster Creek

Buckhorn Cemetery Rd



**DEPARTMENT OF THE ARMY**  
**FORT WORTH DISTRICT, CORPS OF ENGINEERS**  
3110 FM2271  
BELTON, TEXAS 76513-6522

January 11, 2022

HOT Electric Coop  
Attn: Bryan Chandler  
PO Box 357  
McGregor, TX 76657

Dear Mr. Chandler,

Thank you for coordinating with the Belton Lake Office regarding overhead electric lines (OHEs) located on government around the lake. I believe we have made significant progress toward meeting the requirements set forth in US Army Corps of Engineers (USACE) policies and Texas House Bill 4150.

Currently, we have a de-energization plan for recreation facilities operated and maintained by USACE. The Lake Office will continue coordinating with the Heart of Texas Electric Cooperative (HOT) for the de-energization of OHEs in USACE operated recreation areas during flood events at Belton Lake as indicated in the enclosed plan.

Where feasible, the Lake Office will request the termination or retirement of OHEs. There are four locations, Iron Bridge, Owl Creek, Leona, and Cedar Ridge Parks, where an OHE only services security lights. The Lake Office will acquire solar security lights to replace the existing fixtures. When we have the products in hand and are ready to install them, the Lake Office will request the retirement of the subject OHEs. Our goal is to have these locations converted to solar fixtures by September 30, 2022.

Lines not meeting the minimum sag height requirements, and that are not being retired, will need to be raised or rerouted. We have discussed each line individually and I am confident the plans we established will bring us into compliance. The next step is for USACE to grant right of entry to HOT to perform any work which may fall outside established easements or right-of-ways.

Please provide a written request for right of entry (ROE) to be granted by USACE to HOT for the prescribed work. In the letter of request, include beginning and ending dates and enclose maps illustrating the work to be performed, as agreed upon. Please also include in the letter a statement indicating HOT's intent to acquire an easement for lines crossing USACE property at Belton Lake.

When the work described in the ROE is complete, HOT will submit another letter of request for the easement. The request for an easement will need to include surveys and cross sections of the lines.

Please address all correspondence to the USACE Belton Lake Office, Attn: Joshua G. Brown, 3110 FM 2271, Belton, Texas, 76513. Correspondence may be submitted electronically by email to [Joshua.G.Brown@usace.army.mil](mailto:Joshua.G.Brown@usace.army.mil).

Thank you again for the continued coordination efforts regarding the remediation of these lines. These efforts will make the area around Belton Lake safer for the recreating public.

Sincerely,

A handwritten signature in black ink that reads "Joshua G. Brown". The signature is written in a cursive style with a large initial 'J' and a stylized 'B'.

Joshua G. Brown  
Lake Manager  
Belton Lake Office

Enclosure



**DE-ENERGIZATION PLAN**  
**Belton Lake Office – HOT Electric Coop**

| LAKE ELEVATION | PARK        | LOCATION                 | Meter No. | ACTION                 | DATE / TIME COMPLETE |
|----------------|-------------|--------------------------|-----------|------------------------|----------------------|
| 599.30         | Owl Creek   | Boat Ramp                | 143057626 | Pull Meter / Open Fuse |                      |
| 603.50         | Winkler     | Restroom                 | 143467319 | Pull Meter / Open Fuse |                      |
| 603.50         | Winkler     | Park Entrance            | 138449772 | Pull Meter / Open Fuse |                      |
| 605.00         | Iron Bridge | Restroom                 | 68866045  | Pull Meter / Open Fuse |                      |
| 606.00         | Cedar Ridge | West Boat Ramp           | 130623287 | Pull Meter / Open Fuse |                      |
| 606.00         | Leona       | Historical Marker        | 135991851 | Pull Meter / Open Fuse |                      |
| 612.00         | Cedar Ridge | Screened Shelter Loop    | 135177659 | Pull Meter / Open Fuse |                      |
| 613.00         | White Flint | Restroom 1-2 / Boat Ramp | 130620196 | Pull Meter / Open Fuse |                      |
| 615.20         | White Flint | Site 12                  | 135923051 | Pull Meter / Open Fuse |                      |
| 617.00         | White Flint | Site 3                   | 134133156 | Pull Meter / Open Fuse |                      |
| 617.00         | White Flint | Restroom 3               | 133438739 | Pull Meter / Open Fuse |                      |
| 617.00         | White Flint | Park Entrance            | 134133159 | Pull Meter / Open Fuse |                      |
| 618.00         | Cedar Ridge | East Boat Ramp           | 133356683 | Pull Meter / Open Fuse |                      |
| 625.00         | Cedar Ridge | West Boat Ramp           | 130623287 | Pull Meter / Open Fuse |                      |
| 627.00         | Cedar Ridge | Restroom 3               | 133530272 | Pull Meter / Open Fuse |                      |
| 628.00         | Cedar Ridge | Site 24                  | 133358886 | Pull Meter / Open Fuse |                      |

\*NOTE: Spillway Crest 631.00 msl; Pool or Record 634.36, reached on 06 March 1992

**CONTACTS:**

HOT Coop – 254.840.2871 (Account No. 7912)

**USACE**

Belton Lake Office – 254.742.3050

Joshua Brown, Lake Manager – (cell) 254.602.2236